

UNITED STATES DISTRICT COURT

for the
Southern District of Ohio

United States of America
 Raymond L. Williams
 WoodSpring Suites
 4105 Hamilton Square Blvd, Room 427
 Groveport, Ohio 43125

Case No. 2:22-mj-560

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 2022 - July 2022 in the county of Franklin in the
Southern District of Ohio, the defendant(s) violated:

Code Section
 18 U.S.C. 2251(a)

Offense Description
 Sexual Exploitation of a Minor: use of a minor engaged in sexually explicit conduct for the purpose of producing a visual depiction of such conduct

18 U.S.C. 2422(b)

Attempt Coercion and Enticement: persuasion, inducement, enticement, or coercion of a minor to engage in prostitution or any other illegal sexual activity

This criminal complaint is based on these facts:

See attached affidavit incorporated herein by reference

☒ Continued on the attached sheet.ANNA S
EDGAR

Digitally signed by
 ANNA S EDGAR
 Date: 2022.08.12
 09:49:22 -04'00'

Complainant's signature

SA Anna Edgar, HSI

Printed name and title

Sworn to before me and signed in my presence.

Date: August 12, 2022City and state: Columbus, Ohio

Kimberly A. Johnson
 Kimberly A. Johnson
 United States Magistrate Judge



**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In the matter of:

United States of America

v.

Raymond L. Williams

WoodSpring Suites

4105 Hamilton Square Blvd, Room 427

Groveport, Ohio 43125

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Case No.: 2:22-mj-560

Magistrate Judge Jolson

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Anna Edgar (Your Affiant), a Special Agent with the Homeland Security Investigations (HSI), being duly sworn, hereby depose and state:

1. I, Special Agent Anna Edgar (your affiant), make this affidavit in support of a criminal complaint to arrest Raymond L. WILLIAMS for violations of Title 18 United States Code §§ 2251(a) and 2422(b) – the Sexual Exploitation of a Minor and Attempted Coercion and Enticement of a Minor. The statements contained in this affidavit are based in part on information and analysis provided by law enforcement agents; written reports about this and other investigations that I have received and your affiant's personal knowledge and findings during the investigation. Since this affidavit is being submitted for the limited purpose of securing an arrest warrant, your affiant did not include each and every fact known concerning this investigation. Your affiant did not withhold any information or evidence that would negate probable cause. Your affiant set forth only the facts that are believed to be necessary to establish probable cause that WILLIAMS committed the violations listed above.
2. Your affiant is assigned to the HSI Office of the Assistant Special Agent in Charge (ASAC) in Columbus, Ohio, and has been employed by HSI since January 2010. Your affiant gained experience through the completion of the Federal Criminal Investigator Training Program (CITP) and completion of the Immigration and Customs Enforcement Special Agent Training (ICESAT) program. Your affiant's primary duties are and have been the investigation of violations of Titles 8, 18, 19, and 21 of the United States Code. Your affiant has received specialized training and has experience in the above areas. Your affiant has completed numerous applications for criminal complaints, summonses, and search warrants. Your affiant has been assigned to the Franklin County Internet Crimes Against Children (ICAC) Task Force since 2019, where she had conducted and assisted with investigations involving child exploitation and child sexual abuse.

FACTS SUPPORTING PROBABLE CAUSE

3. In or about March of 2022, the Franklin County Internet Crimes Against Children (ICAC) task force received a CyberTipLine report from the National Center for Missing and Exploited Children (NCMEC). The CyberTipLine report, which was dated January 16, 2022, indicated that four images of child sexual abuse material had been uploaded to a Google account. More specifically, the CyberTipLine report noted that those photos were stored in a Google Photos infrastructure, having been uploaded there between January 9, 2022 and January 15, 2022. Your affiant reviewed the files and determined all four files to be child pornography. For example, one image depicted a nude pre-pubescent male sitting on a tiled floor while masturbating.
4. The CyberTipline report also included information pertaining to the Google account subscriber and IP addresses utilized to access the Google account at the time the child pornography files were uploaded. Your affiant would note that the Google subscriber name was that of the identified MINOR VICTIM, a 14-year-old male. In addition, the IP address listed for the Google account came back to MINOR VICTIM's residence in Columbus, Ohio.
5. On or about June 15, 2022, law enforcement executed a search warrant at the residence of MINOR VICTIM. While there, law enforcement spoke with MINOR VICTIM, during which, MINOR VICTIM explained that he utilized the mobile applications Kik, WhatsApp, and Discord which your affiant knows to be third-party messaging applications. MINOR VICTIM indicated he used these platforms to communicate with adult males seeking sexual relationships with minors. MINOR VICTIM stated he would join chatrooms containing the acronyms "MAP" and "AAM", which stood for "Minor Attracted Person" and "Adult Attracted Minor." MINOR VICTIM explained that members of the chatrooms would solicit images of him using sex toys on himself, while wearing his mother's underwear.
6. In further inquiry by law enforcement as to how MINOR VICTIM acquired sex toys, MINOR VICTIM stated that on one occasion, a member of the chatroom placed sex toys in the bushes outside of the Columbus Metropolitan Library. MINOR VICTIM stated that he then retrieved the sex toys from those bushes, photographed himself while using the sex toys, and shared the photos with others. Law enforcement also spoke with the mother of MINOR VICTIM and learned that she had previously found sex toys and a pair of her underwear in a plastic bag in MINOR VICTIM's bedroom.
7. Numerous digital media devices were seized from the home of MINOR VICTIM, including a Motorola cellphone which belonged to MINOR VICTIM. A search of that Motorola cellphone revealed that MINOR VICTIM had been in communications with Raymond L. WILLIAMS who was saved in MINOR VICTIM's cell phone under the name "R." MINOR VICTIM was in contact WILLIAMS via WhatsApp and text messaging and in those text messages, WILLIAMS had utilized the cellular telephone number (740) 870-6825.
8. On June 21, 2022, law enforcement learned that the (740) 870-6825 was resolved to T-Mobile and an administrative subpoena was issued to T-Mobile for subscriber information associated

with that telephone number. On June 24, 2022, the following information was obtained in the response from T-Mobile:

Subscriber Name: Raymond Williams¹

Subscriber Telephone Number: (740) 870-6825

Account Number: 682695600

Subscriber Address: 230 Shallow Ridge Pl. Lancaster, Ohio 43130

Activated: 04/13/2021

Phone Model: SAM A21 32G

9. As the investigation continued, on or about July 15, 2022, law enforcement completed the forensic analysis on the phone belonging to MINOR VICTIM. Numerous communications between MINOR VICTIM and WILLIAMS were recovered. For example, a February 13, 2022 conversation between WILLIAMS and MINOR VICTIM was documented, during which, WILLIAMS and MINOR VICTIM discussed the fact that MINOR VICTIM had been removed from the mobile application Grinder due to MINOR VICTIM being a minor.
10. In addition, a May 31, 2022 conversation was recovered, during which, WILLIAMS asked MINOR VICTIM if MINOR VICTIM would move away with WILLIAMS if WILLIAMS got a job out of state. WILLIAMS and MINOR VICTIM then discussed the potential of eloping when MINOR VICTIM turned 16 years of age.
11. During further review of MINOR VICTIM's phone, law enforcement located a conversation between WILLIAMS and MINOR VICTIM which had occurred on April 3, 2022. In that conversation, WILLIAMS asked MINOR VICTIM if MINOR VICTIM would "be able to make that video." MINOR VICTIM then asked what WILLIAMS wanted and in response, WILLIAMS indicated "it's your choice- just make it good." MINOR VICTIM then distributed to WILLIAMS one video which depicted MINOR VICTIM inserting an anal plug into his anus repeatedly.
12. In another conversation which occurred on May 3, 2022, WILLIAMS asked MINOR VICTIM what MINOR VICTIM was wearing. MINOR VICTIM responded, "just some panties." WILLIAMS requested to see MINOR VICTIM. MINOR VICTIM then distributed one image of his buttocks clothed in women's underwear. In response to receiving the photo, WILLIAMS stated "mmmm take them off and let me see". MINOR VICTIM then distributed one image to WILLIAMS which depicted MINOR VICTIM using his hands to spread his buttocks apart, exposing his anus. After receiving that image, WILLIAMS requested to see MINOR VICTIM'S "dick." MINOR VICTIM then distributed one image which depicted MINOR VICTIM'S erect penis exposed outside of a pair of women's underwear. WILLIAMS responded "mmmm and its hard. Can I see you cum?". At that point, MINOR VICTIM distributed one image which depicted MINOR VICTIM'S hand

¹ Your affiant would note that the significant other of WILLIAMS was also listed as a subscriber on the account associated with this telephone number, however, the investigation has revealed that she is not involved in any criminal activities related to MINOR VICTIM.

holding his erect penis with what appears to be semen on MINOR VICTIM's penis and stomach.

13. After seizing MINOR VICTIM's cellphone at the time of the search warrant execution, law enforcement received consent from MINOR VICTIM's mother to assume the online identity of MINOR VICTIM and to continue to communicate with WILLIAMS in a covert capacity while using MINOR VICTIM's cell phone. On July 18, 2022, law enforcement reestablished communication with WILLIAMS by texting the (740) 870-6825 cellphone number from MINOR VICTIM's cellphone.
14. On July 21, 2022, while assuming the identity of MINOR VICTIM, law enforcement arranged to meet with WILLIAMS at the Columbus Metropolitan Library Southeast Branch, located at 3980 S. Hamilton Rd, Groveport, Ohio 43125, to engage in anal sex in the library bathroom. WILLIAMS was observed walking to the library from the WoodSpring Suites hotel which had been identified as WILLIAMS residence during the course of the investigation. WILLIAMS then entered the library and was taken into custody in the library vestibule. At the time of his arrest, WILLIAMS was found in possession of the cellphone associated to the (740) 870-6825 telephone number, a room key for WoodSpring Suites Room 427, and a pocket knife.
15. After receiving his *Miranda* warnings, WILLIAMS waived and agreed to speak with law enforcement. During the interview, WILLIAMS admitted that he had met MINOR VICTIM at the library on one prior occasion, during which, WILLIAMS provided MINOR VICTIM with an anal plug. WILLIAMS confirmed that at a later time, the anal plug was used by MINOR VICTIM at the direction of WILLIAMS. More specifically, WILLIAMS admitted that he requested MINOR VICTIM record and photograph sexual acts performed with the anal plug.

CONCLUSION

16. Based upon the above information, your affiant submits that there is probable cause to believe Raymond L. WILLIAMS has committed offenses in violation of Title 18 U.S.C. Sections 2251(a) and 2422(b) – the sexual exploitation of a minor and the attempted coercion and enticement of a minor. Therefore, your affiant respectfully requests this court to issue a criminal complaint and arrest warrant.

**ANNA S
EDGAR**

Digitally signed by
ANNA S EDGAR
Date: 2022.08.12
09:50:10 -04'00'

Anna S. Edgar
Special Agent
Homeland Security Investigations

Sworn to and subscribed before me this 12th day of August, 2022.



Kimberly A. Johnson
United States Magistrate Judge

